

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: : CASE NO.: 18-23185  
Mary E Baptiste :  
Debtor : CHAPTER: 13  
: HON. JUDGE.:  
: **ROBERT D. DRAIN**  
: HEARING DATE:  
-----X : September 26, 2018

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN**

**PLEASE TAKE NOTICE** that SN Servicing Corporation as servicer for U.S. bank Trust National Association, as the trustee of Bungalow Series F Trust ("Secured Creditor), the holder of a mortgage of the debtor(s), by and through its undersigned attorneys hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor(s) plan fails to provide for the claim of Secured Creditor. The objecting creditor is due arrears of approximately \$75,808.82, representing a full balance claim, which will be set forth in the Proof of Claim to be filed prior to bar date.
2. Debtor(s) seeks to modify the rights of Secured Creditor, which is the holder of a claim secured only by a security interest in real property that is the principal residence of the debtor(s).
3. Debtor(s) proposed plan fails to comply with the requirements of the Bankruptcy Code.
4. Debtor(s) proposed plan does not provide that Secured Creditor retain its lien.
5. Debtor(s) proposed plan is not feasible.
6. Debtor(s) proposed plan fails to comply with other applicable provisions of Title 11.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C § 1325(a)(4) and 1325(b), et seq. unless the plan provides for full payment of the claim.

FRIEDMAN VARTOLO LLP  
Attorneys for SN Servicing  
Corporation as servicer for U.S. bank  
Trust National Association, as the  
trustee of Bungalow Series F Trust  
85 Broad Street Suite 501  
New York, New York 10004  
By: /s/ Jonathan Schwalb

Jonathan Schwalb, Esq.

Date: September 6, 2018

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**CERTIFICATE OF SERVICE**

On September 6, 2018, I served a true copy of the annexed **NOTICE OF OBJECTION TO CONFIRMATION OF PLAN** by mailing the same by First Class Mail in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee, and the property address as indicated on the attached Service List annexed hereto.

By: /s/ Jonathan Schwalb  
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**SERVICE LIST**

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***Debtor***

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Clair & Gjertsen  
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***Debtor's Attorney***

Krista M. Preuss  
Chapter 13 Standing Trustee  
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***Trustee***

Office of the United States Trustee  
U.S. Federal Office Building  
201 Varick Street, Suite 1006  
New York, NY 10014

***U.S. Trustee***